

July 24, 2017

REMEDIAL INVESTIGATION / FEASIBILITY STUDY

Progress Report #12 – June 2017

Prepared for

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APPENDIX

A. Project Schedule

1.0 INTRODUCTION

This Progress Report (Report) presents a summary of activities completed during the period of June 2017, on behalf of Columbia Falls Aluminum Company, LLC (CFAC), for the Remedial Investigation / Feasibility Study (RI/FS) being performed at the Anaconda Aluminum Co. Columbia Falls Reduction Plant (a/k/a Columbia Falls Aluminum Plant) generally located near Columbia Falls in Flathead County, Montana (“Site”). The RI/FS is being conducted pursuant to the Administrative Settlement Agreement and Order on Consent (AOC) dated November 30, 2015 between CFAC and the United States Environmental Protection Agency (USEPA) (CERCLA Docket No. 08-2016-0002).

This Report provides a description of the actions that have been taken to comply with the AOC during the reporting period and describes work planned for the upcoming reporting period, including an updated project schedule as Appendix A. This report also provides updates regarding the availability of any new, validated sampling data received by CFAC during the reporting period. Lastly, this Report provides an update on any scope revisions and/or project delays encountered and solutions implemented to address any changes.

2.0 WORK COMPLETED

This Section provides a summary of activities completed or ongoing in June 2017.

2.1 Preparation of Response to Comments on Draft Phase I Site Characterization Data Summary Report and Screening Level Ecological Risk Assessment Summary Report

CFAC/Roux Associates received comments on the draft Phase I Site Characterization Data Summary Report (Data Summary Report) and draft Screening Level Ecological Risk Assessment (SLERA) on April 14, 2017 from USEPA and on April 17, 2017 from MDEQ. CFAC/Roux Associates submitted responses on May 26, 2017 to the comments provided by USEPA and MDEQ. The responses to comments were reviewed by USEPA and MDEQ in June 2017. Additional comments from USEPA were provided on June 13, 2017 and additional comments from MDEQ were provided on June 20, 2017. In June 2017, CFAC/Roux Associates reviewed the additional comments and began preparation of responses. CFAC/Roux Associates also continued preparation of revised reports as per the comments from both USEPA and MDEQ. Following completion of the revisions, the revised reports will be resubmitted to USEPA and MDEQ for review.

2.2 Surface Water Sampling – Round #4

The fourth round of surface water sampling was completed during this reporting period, and was conducted from June 12, 2017 to June 15, 2017. During round four, surface water samples were collected from 23 locations within the Flathead River, Cedar Creek, the South Percolation Ponds, the North-East Percolation Ponds, the Backwater Seep Sampling Area, the Northern Surface Water Feature, and the Cedar Creek Reservoir Overflow Drainage Ditch. Surface water sample CFSWP-022 was not collected due to an insufficient amount of water in the Northern Surface Water Feature, and surface water sample CFSWP-023 was not collected due to an insufficient amount of water in the North-West Percolation Pond. The additional surface water sampling location within Cedar Creek (CFSWP-025) that was added to the round two Scope of Work, as discussed in the November 2016 to January 2017 Progress Report #9, was sampled during round four.

Surface water samples collected to date are summarized in Table 1. Surface water samples were collected in accordance with the RI/FS Work Plan, Phase I SAP, Phase I SAP Addendum, SAP

Modification #8, and SAP Modification #9. Similar to rounds one through three, select surface water sample locations within the Flathead River were sampled via boat as approved in SAP Modification #8. All samples were sent to TestAmerica laboratory for analysis of samples via the methods specified in the RI/FS Work Plan.

Select surface water samples were analyzed for free cyanide via USEPA laboratory method 9016 in accordance with SAP Modification #9, in addition to dissolved free cyanide. Seven surface water sample locations (CFSWP-003, 004, 005, 006, 014, 015, 020) were selected for free cyanide analysis based on the sampling results of rounds one through three.

Surface water samples were also analyzed for total and dissolved metals, dissolved total cyanide, and dissolved fluoride, which were added to the scope of work as part of the discussions with EPA/MDEQ during revisions of the Phase I Site Characterization Data Summary Report.

Additionally, as part of round four surface water sampling, the discharge of Cedar Creek and Cedar Creek Drainage Overflow were measured utilizing a mechanical current-meter method in accordance with Roux SOP 6.7. Discharge will be evaluated as part of the Surface Water and Groundwater Data Summary Report to be submitted following evaluation of data all four sampling events.

2.3 Site-Wide Groundwater Gauging

As part of the round four sampling event, Roux Associates conducted gauging of water levels from Site-wide monitoring wells on June 16, 2017. Groundwater levels were collected with an electronic water-level meter capable of measuring fluid elevation within an accuracy of 0.01 ft. All 64 monitoring wells were measured. Gauging data will be included as part of the Round 4 summary to be included in the Surface Water and Groundwater Data Summary Report.

2.4 Groundwater Sampling

The fourth round of groundwater sampling was completed during this reporting period, from June 19, 2017 through June 29, 2017. During the fourth sampling event, Roux Associates and Hydrometrics collected groundwater samples at 63 monitoring well locations. All monitoring

wells were sampled, with the exception of CFMW-025, which had an insufficient amount of water to collect a sample.

Groundwater samples collected to date are summarized in Table 2. Groundwater samples were collected in accordance with the RI/FS Work Plan, Phase I SAP, Phase I SAP Addendum, and SAP Modification #9. All samples were sent to TestAmerica laboratory for analysis of samples via the methods specified in the RI/FS Work Plan. Select groundwater samples were analyzed for free cyanide via USEPA laboratory method 9016, in accordance with SAP Modification #9, in addition to dissolved free cyanide. Fifty-one groundwater sample locations were selected for free cyanide analysis based on the sampling results of round one through round three.

Groundwater samples were also analyzed for total and dissolved metals, dissolved total cyanide, and dissolved fluoride, which were added to the scope of work as part of the discussions with EPA/MDEQ during revisions of the Phase I Site Characterization Data Summary Report.

As discussed with USEPA, the results of the round four groundwater sampling completed during this reporting period will be included in a report summarizing the results of all four groundwater sampling events, which will be provided after round four of groundwater data validation is complete.

2.5 Elevated pH Monitoring

As described in the previous Progress Reports, personnel from Cascade Drilling mobilized to the Site in December 2016 to perform additional monitoring well development and purging activities at the monitoring wells with pH over 10. The pH was subsequently measured by Roux Associates personnel during the December 2016, March 2017, and June 2017 groundwater sampling activities to observe whether pH was reduced. The pH data will be included on field data sheets to be submitted with the groundwater data in the report summarizing the results of all four groundwater sampling events after round four of groundwater sampling is complete. As discussed with the USEPA, Roux Associates and CFAC will continue to monitor the pH conditions during future sampling events.

2.6 Concrete Sampling

Roux Associates submitted a letter to the USEPA dated May 19, 2017, which summarized the results of concrete sampling activities performed in Pot Room #1 and requested approval to use concrete from Pot Room #1 as subgrade backfill during the CFAC demolition activities. In response to the May 19, 2017 letter, the USEPA provided a letter to Roux Associates dated June 7, 2017. The USEPA letter dated June 7, 2017 indicated USEPA's recommendations for pot room #1 and also stated that "Final approval must be coordinated with the MDEQ per the Waste Management Plan".

Calbag has also collected concrete chip samples from Pot Rooms 2 through 4 in accordance with the approved Waste Management Plan and Roux Associates, on behalf of CFAC, has also collected concrete chip samples from Pot Rooms 2 through 4 in accordance with the approved Concrete Sampling and Analysis Plan dated August 31, 2016. This data was submitted to the USEPA via email correspondence on June 19, 2017 and included a recommended path forward for concrete sampling.

In an email on June 28, 2017, USEPA concurred with the path forward for concrete sampling to be performed as one 30-point composite sample per every 5,000 cubic yards of concrete and to be analyzed for the same parameters outlined in Calbag's WMP and Roux's Concrete Sampling and Analysis Plan. Concrete sampling will continue in Pot Rooms 2 through 10 as per the USEPA concurrence. The concrete sampling results will be provided to the USEPA and MDEQ for concurrence prior to using the concrete as backfill material.

2.7 Investigation Derived Waste Management

Roux Associates collected one waste characterization water sample from container #2 on June 30, 2017 following the completion of the fourth groundwater sampling event. The water sample was collected in accordance with the Investigation Derived Waste (IDW) Management Plan dated May 9, 2016. Pending the receipt of the analytical results, Roux Associates will provide the results with a plan for disposal to USEPA and to the Section Manager for Washington States Ecology's Waste 2 Resources Program. The two IDW containers will remain onsite until they can be cleaned and transported offsite.

2.8 Field Modifications

Two field modifications were submitted to USEPA in the May 2017 reporting period, summarizing additional scope of work to the Phase I SAP and SAP Addendum. The May 2017 progress report provided details for the modifications. During this reporting period, USEPA provided concurrence with the following modifications:

1. Phase I SAP Modification #10 (May 24, 2017) Pneumatic and Mechanical Slug Testing – USEPA provided concurrence with Modification #10 in email on June 23, 2017.
2. Phase I SAP Modification #11 (June 12, 2017) – Asbestos Landfill Surface Soil Sampling – USEPA provided signed approval with Modification #11 on June 14, 2017.

2.9 Weekly Reporting, Project Conference Calls, and Project Meetings

Roux Associates submitted a weekly report to the USEPA for each week from June 12, 2017 to July 2, 2017 during the round 4 groundwater and surface water sampling. The weekly reports include a summary of work completed for the prior week, work upcoming for the next week, health and safety, and any additional notable items.

A project update conference call was held with the project team on June 2, 2017. Representatives from USEPA, MDEQ, CFAC, and Roux Associates were present for the call. The call was held to provide an update on the response to comments for the CFAC Phase I Data Summary Report and SLERA Summary Report. A second conference call was held with the project team on June 13, 2017. Representatives from USEPA, MDEQ, CFAC, and Roux Associates were present for the call. The call was held to provide follow-up discussion about the response to comments. Additionally, topics discussed included work progress and schedule.

3.0 WORK PLANNED FOR NEXT REPORTING PERIOD

This section summarizes the work planned for the next reporting period of July 2017.

3.1 Preparation of Response to Comments and Revised Reports

As described in Section 2.1, additional comments from USEPA were provided on June 13, 2017 and additional comments from MDEQ were provided on June 20, 2017. In June 2017, CFAC/Roux Associates reviewed the additional comments and began preparation of responses. CFAC/Roux will revise the two draft reports for re-submittal to the USEPA.

3.2 Groundwater and Surface Water Sampling

Results of the round four surface water and groundwater sampling will be validated during the next reporting period(s) and will be compiled by Roux Associates for review. A report summarizing the results of all four groundwater sampling events will be provided after round four of groundwater sampling laboratory validation is complete.

3.3 Investigation Derived Waste Disposal

As described in Section 2.7, waste characterization water results from water IDW will be provided to USEPA and MDEQ for review when the data is compiled. IDW containers will remain onsite through the next reporting period until the results are reviewed. Pending sample results, Roux Associates, with the support of Cascade Drilling, will coordinate water disposal in accordance with the IDW Management Plan.

3.4 Concrete Sampling and Data Evaluation

Sampling and laboratory analysis of concrete of the Main Plant building is planned to continue during the next reporting period(s), in accordance with the path forward outlined in the letter to USEPA, referenced in Section 2.6. Results of the concrete sampling activities will be provided to the USEPA and MDEQ for review throughout the sampling efforts.

3.5 Summer 2017 Field Activities Scope of Work

During the next reporting period, Roux Associates will mobilize to the CFAC Site to begin slug testing and Asbestos Landfill surface soil sampling in accordance with the field modifications

discussed in Section 2.8. It is anticipated that the slug testing and Asbestos Landfill sampling will be performed in July and through August 2017.

4.0 DATABASE UPDATES

Validation of laboratory data from the Phase I Site Characterization is being performed by Laboratory Data Consultants (LDC) as a subcontractor to Roux Associates. In June 2017, one validated dataset was uploaded to the CFAC RI/FS database by Roux Associates. During the next reporting period(s), Roux Associates anticipates receiving the validated surface water and groundwater data from LDC from Round 4.

Validated data will continue to be imported into the project database and managed in accordance with the data management procedures outlined in Section 7.10 of the QAPP. Future progress reports will discuss updates to the project database.

5.0 SCOPE/SCHEDULE REVISIONS

An updated Phase I Site Characterization schedule is attached to this Progress Report in Appendix A. The schedule was updated to reflect the progress as a result of the activities completed through June 2017. No changes to the schedule are expected at this time for the remaining Phase I Site Characterization tasks.

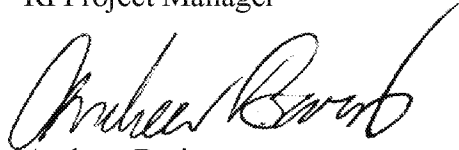
On behalf of CFAC, Roux Associates will continue to pursue the overall objectives described in the AOC and the RI/FS Work Plan. Roux Associates will continue to inform the USEPA of completed and upcoming activities pursuant to the requirements of the AOC in future progress reports.

Respectfully submitted,

ROUX ASSOCIATES, INC.

A handwritten signature in black ink, appearing to read "Michael Ritorto".

Michael Ritorto
Principal Hydrogeologist /
RI Project Manager

A handwritten signature in black ink, appearing to read "Andrew Baris".

Andrew Baris
Vice President / Principal Hydrogeologist
RI/FS Project Manager

TABLES

1. Surface Water Samples Collected through June 2017
2. Groundwater Samples Collected through June 2017

Table 1. Phase I Site Characterization Surface Water Samples
Remedial Investigation / Feasibility Study, Columbia Falls Aluminum Company, Columbia Falls, Montana

Location ID	Date Completed Round 1	Date Completed Round 2	Date Completed Round 3	Date Completed Round 4	Site Feature
CFSWP-001	9/16/2016	12/2/2016	4/4/2017	6/14/2017	Flathead River
CFSWP-002	9/16/2016	12/2/2016	4/4/2017	6/14/2017	Flathead River
CFSWP-003	9/9/2016	12/1/2016	3/16/2017	6/14/2017	Seep Area
CFSWP-004	9/9/2016	12/1/2016	3/16/2017	6/14/2017	Seep Area
CFSWP-005	9/9/2016	12/1/2016	3/16/2017	6/14/2017	Seep Area
CFSWP-006	9/9/2016	12/1/2016	3/16/2017	6/14/2017	Flathead River
CFSWP-007	9/16/2016	12/2/2016	3/16/2017	6/14/2017	Flathead River
CFSWP-008	9/16/2016	12/2/2016	4/4/2017	6/14/2017	Flathead River
CFSWP-009	6/7/2016	DRY	4/3/2017	6/12/2017	Cedar Creek Reservoir Overflow Ditch
CFSWP-010	6/7/2016	DRY	3/15/2017	6/12/2017	Cedar Creek Reservoir Overflow Ditch
CFSWP-011	6/7/2016	DRY	4/3/2017	6/12/2017	Cedar Creek Reservoir Overflow Ditch
CFSWP-012	6/7/2016	DRY	4/3/2017	6/12/2017	Cedar Creek Reservoir Overflow Ditch
CFSWP-013	6/7/2016	11/30/2016	3/15/2017	6/12/2017	Cedar Creek Reservoir Overflow Ditch
CFSWP-014	8/29/2016	11/30/2016	3/13/2017	6/13/2017	Cedar Creek
CFSWP-015	8/29/2016	11/30/2016 and 12/20/2016	3/13/2017	6/13/2017	Cedar Creek
CFSWP-016	8/29/2016	11/30/2016	3/13/2017	6/12/2017	Cedar Creek
CFSWP-017	9/16/2016	12/2/2016	4/4/2017	6/14/2017	Flathead River
CFSWP-018	6/6/2016	12/1/2016	4/3/2017	6/15/2017	South Percolation Ponds
CFSWP-019	6/6/2016	12/1/2016	4/3/2017	6/15/2017	South Percolation Ponds
CFSWP-020	6/6/2016	12/1/2016	3/16/2017	6/15/2017	South Percolation Ponds
CFSWP-021	6/6/2016	11/30/2016	3/15/2017	6/15/2017	Northern SW Area
CFSWP-022	6/6/2016	DRY	4/3/2017	DRY	Northern SW Area
CFSWP-023	DRY	DRY	4/3/2017	DRY	Northwest Percolation Pond
CFSWP-024	DRY	DRY	DRY	6/15/2017	Northeast Percolation Pond

**Table 2. Phase I Site Characterization Groundwater Sampling
Remedial Investigation / Feasibility Study, Columbia Falls Aluminum Company, Columbia Falls, Montana**

Proposed Location ID	Location Type	Screen Type	Date Completed Round 1	Date Completed Round 2	Date Completed Round 3	Date Completed Round 4
CFMW-001	Existing Monitoring Well	Upper Hydrogeologic Unit	9/20/2016	12/12/2017	3/20/2017	6/19/2017
CFMW-002	New Monitoring Well	Upper Hydrogeologic Unit	9/12/2016	Insufficient Water to sample	3/24/2017	6/27/2017
CFMW-003	New Monitoring Well	Upper Hydrogeologic Unit	9/14/2016	12/9/2016	3/22/2017	6/27/2017
CFMW-003a	New Monitoring Well	Below Upper Hydrogeologic Unit	9/20/2016	12/12/2016	3/20/2017	6/19/2017
CFMW-007	Existing Monitoring Well	Upper Hydrogeologic Unit	9/21/2016	12/12/2016	3/28/2017	6/19/2017
CFMW-008	Existing Monitoring Well	Upper Hydrogeologic Unit	9/21/2016	12/16/2016	3/28/2017	6/20/2017
CFMW-008a	New Monitoring Well	Upper Hydrogeologic Unit	9/15/2016	12/16/2016	3/28/2017	6/28/2017
CFMW-010	New Monitoring Well	Upper Hydrogeologic Unit	9/12/2016	12/15/2016	3/24/2017	6/27/2017
CFMW-011	New Monitoring Well	Upper Hydrogeologic Unit	9/13/2016	12/8/2016	3/27/2017	6/28/2017
CFMW-011a	New Monitoring Well	Below Upper Hydrogeologic Unit	9/20/2016	12/14/2016	3/21/2017	6/29/2017
CFMW-012	Existing Monitoring Well	Upper Hydrogeologic Unit	9/12/2016	12/14/2016	3/22/2017	6/23/2017
CFMW-012a	New Monitoring Well	Below Upper Hydrogeologic Unit	9/15/2016	12/13/2016	3/20/2017	6/20/2017
CFMW-014	Existing Monitoring Well	Upper Hydrogeologic Unit	9/12/2016	12/15/2016	3/29/2017	6/27/2017
CFMW-015	Existing Monitoring Well	Upper Hydrogeologic Unit	9/12/2016	12/15/2016	3/29/2017	6/27/2017
CFMW-016	New Monitoring Well	Upper Hydrogeologic Unit	Insufficient Water to sample	Insufficient Water to sample	3/28/2017	6/29/2017
CFMW-016a	New Monitoring Well	Upper Hydrogeologic Unit	9/21/2016	12/14/2016	3/27/2017	6/26/2017
CFMW-017	Existing Monitoring Well	Upper Hydrogeologic Unit	Insufficient Water to sample	Insufficient Water to sample	3/28/2017	6/26/2017
CFMW-018	New Monitoring Well	Upper Hydrogeologic Unit	Insufficient Water to sample	Insufficient Water to sample	3/28/2017	6/20/2017
CFMW-019	Existing Monitoring Well	Upper Hydrogeologic Unit	9/12/2016	12/15/2016	3/29/2017	6/29/2017
CFMW-019a	New Monitoring Well	Below Upper Hydrogeologic Unit	9/20/2016	12/14/2016	3/27/2017	6/26/2017
CFMW-020	Existing Monitoring Well	Upper Hydrogeologic Unit	9/20/2016	12/13/2016	3/21/2017	6/26/2017
CFMW-021	Existing Monitoring Well	Upper Hydrogeologic Unit	9/12/2016	12/14/2016	3/29/2017	6/26/2017
CFMW-022	New Monitoring Well	Upper Hydrogeologic Unit	9/13/2016	12/9/2016	3/28/2017	6/26/2017
CFMW-023	Existing Monitoring Well	Upper Hydrogeologic Unit	9/21/2016	12/19/2016	3/21/2017	6/27/2017
CFMW-025	Existing Monitoring Well	Upper Hydrogeologic Unit	Insufficient Water to sample	Insufficient Water to sample	Insufficient Water to sample	Insufficient Water to sample
CFMW-025a	New Monitoring Well	Below Upper Hydrogeologic Unit	9/13/2016	12/5/2016	3/24/2017	6/22/2017
CFMW-025b	Existing Monitoring Well	Upper Hydrogeologic Unit	9/13/2016	12/7/2016	3/20/2017	6/22/2017
CFMW-026	New Monitoring Well	Upper Hydrogeologic Unit	9/13/2016	12/5/2016	3/20/2017	6/22/2017
CFMW-027	New Monitoring Well	Upper Hydrogeologic Unit	9/13/2016	12/14/2016	3/27/2017	6/26/2017
CFMW-028	New Monitoring Well	Upper Hydrogeologic Unit	9/13/2016	12/5/2016	3/20/2017	6/26/2017
CFMW-028a	New Monitoring Well	Upper Hydrogeologic Unit	9/20/2016	12/9/2016	3/21/2017	6/27/2017
CFMW-029	New Monitoring Well	Upper Hydrogeologic Unit	9/13/2016	12/14/2016	3/24/2017	6/26/2017
CFMW-031	Existing Monitoring Well	Upper Hydrogeologic Unit	9/15/2016	12/9/2016	3/21/2017	6/21/2017
CFMW-032	New Monitoring Well	Upper Hydrogeologic Unit	9/15/2016	12/13/2016	3/27/2017	6/20/2017
CFMW-032a	New Monitoring Well	Below Upper Hydrogeologic Unit	9/16/2016	12/16/2016	3/29/2017	6/27/2017
CFMW-033	New Monitoring Well	Upper Hydrogeologic Unit	9/15/2016	12/6/2016	3/21/2017	6/19/2017
CFMW-034	New Monitoring Well	Upper Hydrogeologic Unit	9/14/2016	12/13/2016	3/21/2017	6/19/2017
CFMW-035	New Monitoring Well	Upper Hydrogeologic Unit	9/13/2016	12/13/2016	3/21/2017	6/20/2017
CFMW-037	New Monitoring Well	Upper Hydrogeologic Unit	9/16/2016	12/8/2016	3/23/2017	6/20/2017
CFMW-038	New Monitoring Well	Upper Hydrogeologic Unit	9/14/2016	12/9/2016	3/24/2017	6/27/2017
CFMW-040	New Monitoring Well	Upper Hydrogeologic Unit	9/14/2016	12/13/2016	3/30/2017	6/20/2017
CFMW-042	New Monitoring Well	Upper Hydrogeologic Unit	9/14/2016	Insufficient Water to sample	Insufficient Water to sample	6/20/2017
CFMW-043	New Monitoring Well	Upper Hydrogeologic Unit	9/13/2016	12/14/2016	3/20/2017	6/21/2017
CFMW-044	Existing Monitoring Well	Upper Hydrogeologic Unit	9/15/2016	12/9/2016	3/28/2017	6/21/2017
CFMW-044a	New Monitoring Well	Upper Hydrogeologic Unit	9/19/2016	12/19/2016	3/21/2017	6/23/2017
CFMW-044b	Existing Monitoring Well	Below Upper Hydrogeologic Unit	9/19/2016	12/19/2016	3/24/2017	6/23/2017
CFMW-045	New Monitoring Well	Upper Hydrogeologic Unit	9/15/2016	12/14/2016	3/23/2017	6/28/2017
CFMW-045a	New Monitoring Well	Upper Hydrogeologic Unit	9/19/2016	12/9/2016	3/24/2017	6/23/2017
CFMW-047	New Monitoring Well	Upper Hydrogeologic Unit	9/14/2016	12/15/2016	3/23/2017	6/21/2017
CFMW-049	Existing Monitoring Well	Upper Hydrogeologic Unit	9/21/2016	12/15/2016	3/23/2017	6/21/2017
CFMW-049a	New Monitoring Well	Upper Hydrogeologic Unit	9/16/2016	12/15/2016	3/23/2017	6/21/2017
CFMW-050	New Monitoring Well	Upper Hydrogeologic Unit	9/19/2016	12/15/2016	3/23/2017	6/21/2017
CFMW-053	Existing Monitoring Well	Upper Hydrogeologic Unit	9/14/2016	12/12/2016	Insufficient Water to sample	6/28/2017
CFMW-053a	New Monitoring Well	Below Upper Hydrogeologic Unit	9/19/2016	12/19/2016	3/27/2017	6/28/2017
CFMW-054	New Monitoring Well	Upper Hydrogeologic Unit	9/14/2016	12/12/2016	3/22/2017	6/21/2017
CFMW-056	Existing Monitoring Well	Below Upper Hydrogeologic Unit	9/20/2016	12/13/2016	3/22/2017	6/22/2017
CFMW-056a	New Monitoring Well	Below Upper Hydrogeologic Unit	9/20/2016	12/6/2016	3/30/2017	6/22/2017
CFMW-056b	New Monitoring Well	Upper Hydrogeologic Unit	9/13/2016	12/12/2016	3/21/2017	6/22/2017
CFMW-057	Existing Monitoring Well	Below Upper Hydrogeologic Unit	9/19/2016	12/5/2016	3/29/2017	6/28/2017
CFMW-057a	New Monitoring Well	Below Upper Hydrogeologic Unit	9/19/2016	12/16/2016	3/22/2017	6/28/2017
CFMW-059	New Monitoring Well	Upper Hydrogeologic Unit	9/15/2016	12/12/2016	3/23/2017	6/21/2017
CFMW-059a	New Monitoring Well	Below Upper Hydrogeologic Unit	9/19/2016	12/16/2016	3/29/2017	6/28/2017
CFMW-061	New Monitoring Well	Upper Hydrogeologic Unit	9/15/2016	12/7/2016	3/23/2017	6/23/2017
CFMW-064	New Monitoring Well	Upper Hydrogeologic Unit	9/15/2016	12/7/2016	3/23/2017	6/23/2017

Project Schedule

Task Name	Duration	Start	Finish	Company
AOC is executed by all parties	1 day	Mon 11/30/15	Mon 11/30/15	EPA/CFAC
Historical Records Review	160 days	Mon 2/8/16	Fri 9/16/16	Roux
Draft Health and Safety Plan (HASP)	30 edays	Mon 11/30/15	Wed 12/30/15	Roux
Final Health and Safety Plan (HASP)	25 days	Thu 12/31/15	Wed 2/3/16	Roux
Site is clear of Snow / Field Work Begins	1 day	Mon 4/4/16	Mon 4/4/16	
Pre-Intrusive Task 1 - Site Reconnaissance	10 days	Mon 4/4/16	Fri 4/15/16	Roux
Pre-Intrusive Task 2 - Geophysical Survey	5 days	Mon 4/18/16	Fri 4/22/16	Roux
Pre-intrusive Task 3 - Soil Gas Survey	7 days	Mon 4/18/16	Tue 4/26/16	Roux
SAP Addendum	75 days	Mon 4/18/16	Fri 7/29/16	Roux
Draft SAP Addendum	40 days	Mon 4/18/16	Fri 6/10/16	Roux
EPA Review of Draft SAP Addendum	15 days	Mon 6/13/16	Fri 7/1/16	EPA
Final SAP Addendum	20 days	Mon 7/4/16	Fri 7/29/16	Roux
Source Area Investigation - Phase I Site Characterization Field Activities	120 days	Mon 5/9/16	Fri 10/21/16	Roux/Hydrometrics
GPR Utility Mark-Outs	5 days	Mon 5/9/16	Fri 5/13/16	Roux
Clearing / Grading for Drill Rig Access	4 days	Wed 5/11/16	Mon 5/16/16	Roux
Sonic Rig 1	75 days	Mon 5/16/16	Fri 8/26/16	Roux
Sonic Rig 2	50 days	Mon 5/16/16	Fri 7/22/16	Roux
Geoprobe	20 days	Mon 5/16/16	Fri 6/10/16	Hydrometrics
Landfill GPR Survey Field Work	3 days	Mon 7/25/16	Wed 7/27/16	Roux
Test Pitting	5 days	Mon 8/15/16	Fri 8/19/16	Roux
Additional Monitoring Well redevelopment activities	10 days	Mon 10/10/16	Fri 10/21/16	Hydrometrics
Background Area Investigation	5 days	Mon 6/13/16	Fri 6/17/16	Hydrometrics
Operational Grid Area Investigation	30 days	Mon 6/20/16	Fri 7/29/16	Hydrometrics
Site-Wide Surface Water Sampling - Event 1	5 days	Mon 9/5/16	Fri 9/9/16	Roux/Hydrometrics
Site-Wide Groundwater Sampling - Event 1	15 days	Mon 9/12/16	Fri 9/30/16	Roux/Hydrometrics
Site-Wide Surface Water Sampling - Event 2	5 days	Mon 12/5/16	Fri 12/9/16	Roux/Hydrometrics
Site-Wide Groundwater Sampling - Event 2	15 days	Mon 12/12/16	Fri 12/30/16	Roux/Hydrometrics
Site-Wide Surface Water Sampling - Event 3	5 days	Mon 3/13/17	Fri 3/17/17	Roux/Hydrometrics
Site-Wide Groundwater Sampling - Event 3	15 days	Mon 3/20/17	Fri 4/7/17	Roux/Hydrometrics
Site-Wide Surface Water Sampling - Event 4	5 days	Mon 6/12/17	Fri 6/16/17	Roux/Hydrometrics
Site-Wide Groundwater Sampling - Event 4	15 days	Mon 6/19/17	Fri 7/7/17	Roux/Hydrometrics
Investigation Derived Waste Management/Disposal	375 days	Mon 4/4/16	Fri 9/8/17	Roux
Phase I Site Characterization Data Summary Report	215 days	Mon 10/3/16	Fri 7/28/17	Roux
Data Validation Completion	35 days	Mon 10/3/16	Fri 11/18/16	Data Validator
Draft Phase I Site Characterization Summary Report to EPA/MDEQ	71 days	Mon 11/21/16	Mon 2/27/17	Roux
EPA review of Draft Phase I Data Summary Report	30 days	Mon 3/6/17	Fri 4/14/17	EPA
Response to EPA/MDEQ Comments on Draft Phase I Data Summary Report	40 days	Mon 4/17/17	Fri 6/9/17	Roux/EPA
Final Phase I Summary Report to EPA/MDEQ	45 days	Mon 5/29/17	Fri 7/28/17	Roux
Screening Level Ecological Risk Assessment (SLERA)	330 days	Mon 5/2/16	Fri 8/4/17	Roux
Completion of SLERA Field Work	5 days	Mon 5/2/16	Fri 5/6/16	Roux
Draft SLERA Summary Report	71 days	Mon 11/21/16	Mon 2/27/17	Roux
EPA review of Draft SLERA Report	30 days	Mon 3/6/17	Fri 4/14/17	EPA
Response to EPA/MDEQ Comments on Draft SLERA Summary Report	40 days	Mon 4/17/17	Fri 6/9/17	Roux/EPA
Final SLERA Report to EPA/MDEQ	50 days	Mon 5/29/17	Fri 8/4/17	Roux
2017 Additional Field Activities	90 days	Mon 4/17/17	Fri 8/18/17	
Preparation of 2017 field activities plan/SAP Mods	30 days	Mon 4/17/17	Fri 5/26/17	Roux
Pneumatic Slug Testing	15 days	Mon 7/10/17	Fri 7/28/17	Roux
Asbestos Landfill Soil Sampling	15 days	Mon 7/31/17	Fri 8/18/17	Roux/Hydrometrics
Groundwater and Surface Water Sampling Data Summary Report	60 days	Mon 7/10/17	Fri 9/29/17	
Validation of Round 4 sampling data	30 days	Mon 7/10/17	Fri 8/18/17	Data Validator
GW/SW Summary Report to EPA/MDEQ	30 days	Mon 8/21/17	Fri 9/29/17	Roux
Candidate Technologies Memo	90 days	Mon 7/31/17	Fri 12/1/17	
Draft Candidate Technologies Memo to EPA/MDEQ	35 days	Mon 7/31/17	Fri 9/15/17	Roux
EPA review of draft Candidate Technologies Memo	25 days	Mon 9/18/17	Fri 10/20/17	EPA
Response to EPA/MDEQ comments on Candidate Technologies Memo	15 days	Mon 10/23/17	Fri 11/10/17	Roux
Final Candidate Technologies Memo to EPA/MDEQ	15 days	Mon 11/13/17	Fri 12/1/17	Roux
Baseline Human Health Risk Assessment Work Plan	115 days	Mon 8/21/17	Fri 1/26/18	
Draft BHHRA Work Plan to EPA/MDEQ	40 days	Mon 8/21/17	Fri 10/13/17	Roux/EHS Support
EPA review of draft BHHRA Work plan	30 days	Mon 10/16/17	Fri 11/24/17	EPA
Response to EPA/MDEQ Comments on BHHRA Work Plan	30 days	Mon 11/27/17	Fri 1/5/18	Roux
Final BHHRA WP to EPA/MDEQ	15 days	Mon 1/8/18	Fri 1/26/18	Roux
Baseline Ecological Risk Assessment Work Plan	115 days	Mon 8/21/17	Fri 1/26/18	
Draft BERA Work Plan to EPA/MDEQ	40 days	Mon 8/21/17	Fri 10/13/17	Roux/EHS Support
EPA review of draft BERA Work Plan	30 days	Mon 10/16/17	Fri 11/24/17	EPA
Response to EPA/MDEQ Comments on BERA Work Plan	30 days	Mon 11/27/17	Fri 1/5/18	Roux
Final BERA Work Plan to EPA/MDEQ	15 days	Mon 1/8/18	Fri 1/26/18	Roux
Phase II Remedial Investigation Sampling and Analysis Plan	120 days	Mon 10/16/17	Fri 3/30/18	
Draft Phase II Sampling and Analysis Plan to EPA/MDEQ	55 days	Mon 10/16/17	Fri 12/29/17	Roux</